

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

INTERROGATORIES OF
ASSOCIATION FOR POSTAL COMMERCE
TO USPS WITNESS KINGSLEY
(POSTCOM/USPS-T-39-17)

Pursuant to Sections 25 and 26 of the rules of practice, the Association for
Postal Commerce submits the attached interrogatories to USPS witness
Kingsley: PostCom/USPS-T-39-17.

Respectfully submitted,

Ian D. Volner fw

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November 6, 2001

POSTCOM/USPS-T39-17. In your answer to Postcom/USPS-T-39-12 (b) and (c) you referred to witness Kiefer's SWP2-1. Do you agree with his "Estimated Share of Presort Flats that would use clients barcode"?

- (a) If your answer is affirmative, why do you think that the correct percentage is "Eligible Presorted Flats Divided by Total Presorted bpm Flats"?
- (b) If you do not agree with Mr. Kiefer's estimation, what is yours?

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.



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